

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
STATE OF CALIFORNIA, STATE OF
COLORADO, STATE OF ILLINOIS,
STATE OF INDIANA, STATE OF IOWA,
STATE OF MINNESOTA, STATE OF
NEBRASKA, STATE OF OREGON,
STATE OF TENNESSEE, STATE OF
TEXAS, STATE OF WASHINGTON, and
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION, LLC,
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

JOINT STATUS REPORT

Pursuant to the Court’s June 20, 2025 order, Plaintiffs Federal Trade Commission and the states of California, Colorado, Illinois, Indiana, Iowa, Minnesota, Nebraska, Oregon, Tennessee, Texas, Washington, and Wisconsin, acting by and through their respective Attorneys General (“Plaintiffs”); Defendants Syngenta Crop Protection AG, Syngenta Corporation, Syngenta Crop Protection, LLC (collectively, “Syngenta”); and Defendant Corteva, Inc. (together with Plaintiffs and Syngenta, the “Parties”) have met and conferred and hereby submit this Joint Status Report in advance of the July 16, 2025 hearing.

Motion To Compel. On July 7, 2025, Plaintiffs and Syngenta discussed via videoconference the three requests for admission at issue in Plaintiffs’ motion to compel (Doc. 322). Plaintiffs asked whether Syngenta would amend its responses to those requests to provide partial admissions, partial denials, and qualifications in the manner Plaintiffs described in their reply brief. *See* Doc. 330 at 5–6. On July 8, Syngenta informed Plaintiffs that it would not do so. Syngenta indicated that it disagrees with Plaintiffs’ apparent interpretation of Federal Rule of Civil Procedure 36. In Syngenta’s view, Plaintiffs’ standard seemingly requires a party to respond not to the request as written, but to the request as it may be interpreted in any manner to arrive at something that may be admitted. Plaintiffs and Syngenta remain at impasse with respect to the requests for admission at issue.

Dated: July 14, 2025

Respectfully submitted,

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